

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WILLIAM DURLING, CHRIS BELLASPICA,	:	
TOM WOLFF, MICHAEL MORRIS, and	:	
RICHARD SOBOL, for themselves and all others	:	Case No. 7:16-CV-03592
similarly situated,	:	
	:	Class/Collective Action
Plaintiff,	:	
	:	
- against -	:	
	:	
PAPA JOHN'S INTERNATIONAL, INC.,	:	
	:	
Defendant.	:	
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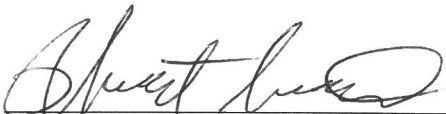
DECLARATION OF ROBERT SMITH

I, Robert Smith, based on my personal knowledge and pursuant to 28 U.S.C. § 1746,
declare as follows:

1. I am currently employed by Papa John's International, Inc. ("PJI") as Senior Vice President of Human Resources.
2. Papa John's USA, Inc. (a subsidiary of PJI) owns 70% of Colonel's Limited, LLC ("Colonel's").
3. PJI provides certain services, including services related to mileage reimbursement and management of human resources, to Colonel's.
4. There are approximately 3,300 independently owned and operated Papa John's stores in the United States.
5. PJI does not provide mileage reimbursement or human resources services to these independently owned franchisees.
6. Independently owned franchisees set their own mileage reimbursement policies and rates.

I declare under penalty of perjury that the foregoing is true and correct.

January 10, 2018
Date


Robert Smith